

## **REMARKS/ARGUMENTS**

### **Claim Amendments**

The Applicant has amended claims 21-22, 24, 29-31, 33 and 38. Support for the amendments can be found on page 10, lines 15-23 and other locations in the Specification. Applicant respectfully submits no new matter has been added. Accordingly, claims 21-39 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

### **Response to Arguments**

The Applicant respectfully appreciates the Examiner's thorough explanation of the Examiner's position. As noted by the Examiner, the rejection arguments are the same as in the previous action. The Applicant believes that an explanation of the amendments in claims 21 and 30 would be appropriate.

The Examiner rejected the Applicant's argument (page 3, lines 6-10) that "encapsulation of the physical address within a PSAP message is not disclosed." The Examiner suggested that the claim language was too broad and needs to be amended to distinguish the claims. The Applicant has amended claims 21, 30 and the respective depending claims using the subject matter on page 10, lines 15-23. The claims have been amended to more narrowly claim the invention.

### **Claim Rejections – 35 U.S.C. § 103 (a)**

Claims 21-39 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over US Patent 5,161,180 to Chavous in view of US Patent Application Publication 2001/0055299 to Kelly and in further view of US Patent 6,151,631 to Ansell et al. The Applicant respectfully traverses the rejection of these claims.

21. (Currently Amended) A method of routing an emergency request message from an Internet device through the Internet to an emergency call answering center connected to a Public Service Access Point (PSAP), comprising the steps of:

routing the emergency request message to an emergency call handling function that is configured to determine the IP address of the Internet device;  
the emergency call handling function querying an Internet Service Provider (ISP) associated with the Internet device, the ISP having account information associated with the IP address of the Internet device;  
utilizing the IP address of the Internet device to obtain a physical address from the account information;  
encapsulating the physical address information within a PSAP message;  
the emergency call handling function sending the physical address information to the emergency call answering center; and  
sending the emergency request message through Public Switched Telephone Network (PSTN) to a PSAP in an emergency response service zone serving the Internet device.

The distinguishing feature of the amended independent claims is the use of physical address/location records contained in user records that are created when the user, to gain access to the Internet, registers the Internet device with an Internet Service Provider. The registration, or account, information includes a physical address of the user's Internet device along with a phone number and other user information. In case of an emergency call the physical address/location, which is associated with the user's IP address, may be obtained and relayed to an emergency call handling function (page 10 lines 15-23). The emergency call handling function sends the emergency request message and the physical location of the user's internet device to the PSAP that serves the area in which the user's device is located.

The Applicant respectfully submits that the Chavous, Kelly and Ansell references do not disclose the use of an emergency call handling function accessing a user's account records at an ISP that services the user to correlate a detected IP address with a physical address of a user/Internet device. And, send the physical address along with the emergency message to PSAP.

Chavous discloses a method and system for determining the location of a PBX extension phone in a PBX system. Chavous discloses a PBX and call interceptor (equated with the Applicant's emergency call handling) with its own internal database containing the geographic location of each connected extension. The Applicant

respectfully submits that the PBX is limited by its capacity for handling predetermined extensions, whereas the emergency call handling function is limited only by the number of ISPs that the call handling function can access on the Internet.

With regard to the Kelly reference, Kelly discloses a method and apparatus to enable packet switched networks and circuit switched networks to communicate. Kelly, like Chavous discloses the use of a PBX.

In regards to Ansell, Ansell discloses the territorial determination of a remote computer location in a wide area network.

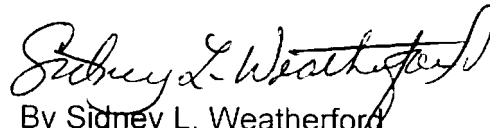
The Applicant respectfully submits that Chavous, Kelly and Ansell, whether individually or in combination, do not disclose all the limitations of claim 21 and 30. This being the case, the Applicant respectfully requests withdrawal of the rejection of claims 21 and 30. Claims 22-29 and 31-39 depend respectively from amended claims 21 and 30 and recite further limitations of these claims. Therefore, the allowance of claims 21-39 is respectfully requested.

### CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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Date: September 14, 2007

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